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Attorneys for Plaintiff Margo Perryman

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARGO PERRYMAN individually, and for
other persons similarly situated,

Plaintiff,

vs.

LITTON LOAN SERVICING, LP; OCWEN
LOAN SERVICING LLC; AMERICAN
SECURITY INSURANCE COMPANY;
AMERICAN MODERN HOME
INSURANCE COMPANY; ALTISOURCE
PORTFOLIO SOLUTIONS, S.A., BELTLINE
ROAD INSURANCE AGENCY, INC.; and
DOES 4-100,

Defendants.

Case No.: 3:14-cv-02261-JST

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF TO FILE AN
AMENDED COMPLAINT; ~~PROPOSED~~
ORDER**

Civil Local Rule 6-2

1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Plaintiff Margo Perryman (“Plaintiff”), and
2 Defendants Litton Loan Servicing, LP and American Modern Home Insurance Company
3 (“American Modern”), through their respective attorneys, stipulate as follows:

4 WHEREAS, on August 19, 2015, this Court held a Case Management Conference and set
5 a deadline of November 19, 2015 for Plaintiff to file a Second Amended Complaint (Dkt. No.
6 212);

7 WHEREAS, prior to amending her Complaint, Plaintiff contends she requires certain
8 documents and/or testimony from non-party Southwest Business Corporation (“SWBC”);

9 WHEREAS, on October 9, Plaintiff served a subpoena to obtain documents and testimony
10 from SWBC;

11 WHEREAS, as of the date of this stipulation, Plaintiff contends that SWBC has not
12 produced all documents and information responsive to the subpoena;

13 WHEREAS, Defendant American Modern has also entered into a settlement in principle in
14 a parallel, partially overlapping class action pending in the Southern District of New York,
15 captioned *Lyons v. Litton Loan Servicing LP, et al.*, S.D.N.Y. Case No. 13-cv-00513 (ALC)
16 (“*Lyons*”), whose terms will be finalized by December 12, 2015 and will become public shortly
17 thereafter;

18 WHEREAS, this case is currently stayed against all Defendants other than Litton and
19 American Modern – American Security Insurance Company, Ocwen Loan Servicing, LLC,
20 Altisource Portfolio Solutions, S.A., and Beltline Road Insurance Agency, Inc., pending the
21 resolution of settlement proceedings in *Lee v. Ocwen Loan Servicing, LLC, et al.*, S.D. Fla. Case
22 No. 14-cv-60649;

23 WHEREAS, Plaintiff and Defendants Litton and American Modern stipulate and agree
24 that good cause exists to extend the deadline for Plaintiff to file the Second Amended Complaint
25 to January 15, 2016, to allow Plaintiff to complete discovery as to SWBC, and assess the impact
26 of American Modern’s settlement in the *Lyons* action on this case and Plaintiff’s potential
27 amendments to the operative Complaint.

28 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to

1 the Court's approval, Plaintiff and Defendants Litton and American Modern agree to the
2 following:

- 3 • The deadline for Plaintiff to file and serve the Second Amended Complaint shall be
4 extended to January 15, 2016.

5 DATED: November 16, 2015

LAW OFFICE OF SHERI L. KELLY

6 By: /s/ Sheri L. Kelly

7 Attorneys for Plaintiff

8 MARGO PERRYMAN

9 DATED: November 16, 2015

HUNTON & WILLIAMS LLP

10
11 By: /s/ Ryan Becker

12 Attorneys for Defendants

13 OCWEN LOAN SERVICING LLC and

LITTON LOAN SERVICING, LP

14 DATED: November 16, 2015

BAKER HOSTETLER

15
16 By: /s/ Rodger Eckelberry

17 Attorneys for Defendant

18 AMERICAN MODERN HOME

INSURANCE COMPANY

19 **FILER'S ATTESTATION**

20 I, Sheri L. Kelly, attest, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the filing of
21 this document has been obtained from the other signatory to this document.

22 DATED: November 16, 2015

LAW OFFICE OF SHERI L. KELLY

23 Sheri L. Kelly

24 By: /s/ Sheri L. Kelly

25 Sheri L. Kelly

26 Attorneys for Plaintiff

27 MARGO PERRYMAN
28

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The deadline for Plaintiff to file and serve the Second Amended Complaint shall be extended to January 15, 2016.

DATED: November 18, 2015

